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April 12, 1995

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Bill Hill
Code 1851
Southern Division
Naval Facilities Engineering Command
P.O. Box 190010
North Charleston, South Carolina 29419-0068

RE: Draft Remedial Investigation Report, Site 38 - Building 71 and associated Industrial Waste Treatment Plant (IWTP) Sewer Line, Naval Air Station Pensacola.

Dear Mr. Hill:

I have completed the technical review of the subject document, dated December 6, 1994 (received December 8, 1994). Before this document is considered acceptable the following comments should be addressed:

1. If possible, figures should be plotted on pages to be folded to fit adjacent to the text, instead of the large blue-line size sheets.

2. Section 2.1 (Site Description and History): The text should denote that paint stripping and plating facilities disposed of untreated industrial wastes into Pensacola Bay from 1935 (and possibly earlier) until the IWTP sewer line was constructed in the 1970s.

3. Section 4.3.3: Due to the presence of detected solvents emanating from petroleum Site 604, this site should be transferred to the CERCLA portion of the Installation Restoration Program.

4. What is the cause of the small circular area near Pensacola Bay (Figure 6-5) and the reverse groundwater flow?

5. Separate figures with isocontours for shallow and intermediate depth groundwater contamination should be provided.

Section 7, Building 71 Area:

6. Additional soil samples should be collected to delineate the horizontal extent of arsenic contamination around 38812 and 38833, having respective levels of 15.8 mg/kg and 21.1 mg/kg. Also, contouring errors in Figure 7-11 should be corrected.

7. A minimum of two shallow monitoring wells should be installed to delineate the contamination detected in soil-gas samples SG651 and GS680/681 (collected within 6 inches of the water table).

8. A minimum of one water table and one intermediate depth monitoring well should be installed to delineate the horizontal and vertical extent of VOC, SVOC, and metal groundwater contamination. An intermediate monitoring well should be installed adjacent to 38GS12 (to function as a vertical extent source well), and a shallow monitoring well should be installed east of 38GS02 to delineate the migration of the groundwater plume along the seawall. Note, if significant contamination is detected in this intermediate depth well, then a deep monitoring well should be installed.

9. Sampling data from monitoring wells near surface water bodies should be compared to Florida Surface Water Quality Standards (Rule 62-302, F.A.C.).

10. Surface water and sediment samples should be collected adjacent to where the groundwater plume contacts the seawall (near monitoring well 38813) to determine if groundwater contamination is impacting Pensacola Bay. Note, the closest sediment sample locations associated with Site 2 (Waterfront Sediments), at 100 feet from the seawall, are too distal to measure maximum contaminant concentrations. Also, as agree by the Tier I Partnering Team many months ago, preliminary sediment and surface water samples would be collected in potentially impacted waterbodies and wetlands during the assessment of the site emanating contamination to these waterbodies and wetlands.

Section 7, Sewer Line Area (Area south of Building 604):

11. Additional soil samples should be collected to delineate the degree and extent of lead contamination. Specifically, additional samples should be collected around samples 3852603, 38SB74N02, and 38SB75E02 with detected levels of 897 mg/kg, 949 mg/kg, and 579 mg/kg respectively. Additionally, since these levels may fail TCLP, samples should be collected from the previous areas for TCLP.

12. Soil and groundwater samples should be collected from the "Area Not Defined". Note, if this area is part of Petroleum Site 604, this data should be incorporated into Site 38 (See Comment No. 3).

13. Figure 7-14: A minimum of six water table monitoring wells should be installed to delineate the horizontal extent of VOC, SVOC and metal groundwater contamination. Wells should be installed south of 38GI09, just south of IWTP manhole cover D-4, clustered with 386108, south of 386518, east of 38GS14, and north of 38GS21.

14. Contaminated temporary monitoring wells 36MW75C and 36MW76C, denoted on Table 7-14, should be illustrated on all appropriate figures. Note, when these wells are plotted and the spatial relationship of these wells to surrounding wells is evaluated, additional monitoring wells may be needed to delineate groundwater contamination.

15. Detected levels should also be compared to Florida Secondary Groundwater Standards (Rule 62-520 and 62-550, F.A.C).

Section 10 (Baseline Risk Assessment):

16. Page 10-5: With the inclusion of the inhalation pathway in the calculation of RGOs/Cleanup Levels, FDEP utilizes 1E-6 for carcinogenic Chemicals of Concern (COCs) and 1.0 hazard quotient for non-carcinogenic COCs as default criteria. Therefore, the cancer risks and hazard quotients of the Chemicals of Potential concern (COPCs) above these levels should be renamed COCs, and the soil, sediment and groundwater pathways included in the Feasibility Study as areas of possible remediation.

17. Page 10-18. A residential scenario should be considered for all media in the BRA. Thus, the consideration of only an occupational scenario for soil contamination under Building 71 is not adequate.

18. Page 10-149: Though the Sand and %ravel aquifer is not presently used as a potable water supply at NAS Pensacola, the BRA should consider a future resident scenario and use of the aquifer as a potable water supply.

If I can be of any further assistance with this matter, please contact me at (904) 488-3935 or (904) 921-9989.

Sincerely,

David M. Clowes, P. C.
Remedial Project Manager

/dmc

cc: Ron Joyner, NAS Pensacola
Allison Humphris, EPA Region IV
Henry Beiro/Brian Caldwell, Ensafe, Pensacola
Phil Crotwell, Bechtel, Knoxville, TN
Tom Moody, FDEP Northwest District
John Mitchell, FDEP Natural Resource Trustee

TJB _____ JJC _____ ESN ESN